

(Used DNA from Tucson Office)
(Not this one)

Worksheet
Documentation of Land Use Plan Conformance and NEPA Adequacy
(DNA) AZ-

U.S. Department of the Interior
Bureau of Land Management (BLM)

Note: This worksheet is to be completed consistent with the policies stated in the Instruction Memorandum entitled “Documentation of Land Use Plan Conformance and National Environmental Policy Act (NEPA) Adequacy” transmitting this worksheet and the “Guidelines for Using the DNA Worksheet” located at the end of the worksheet. (Note: The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM’s internal analysis process and does not constitute an appealable decision.)

A. **BLM Office:** Safford Field Office

Lease/Serial/Case File No.

Proposed Action Title/Type: Todd’s Guide Service

Location of Proposed Action: Graham County

Description of the Proposed Action: Todd’s Guide Service’s use of the public lands includes guided hunts for mountain lions in unit 28. Group size would average three people per trip, including guides with a maximum of five people per trip. A maximum of five horses and 10 dogs would be authorized however only five dogs would be used for tracking during active hunts and the others would remain at base camp and under control at all times. Overnight base camps would consist of a travel trailer and up to three tents. Length of stay at base camps may occasionally exceed 14 days when necessary to fill client’s tag, but would not exceed the length of the hunting season. The applicant would obtain permission to use existing corrals from grazing permittees whenever possible or use portable corral panels in existing disturbed areas. Most cooking would be done with a propane stove and campfires would be built where authorized. All trash and game parts would be hauled out and properly disposed of. Cat holes or portable chemical toilets would be used for human waste.

This would be a 5-year permit.

Applicant (if any): _____

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

LUP Name* Safford RMP

Date Approved ROD Part I
Sept, 1992 and ROD Part II
July, 1994

LUP Name* _____

Date Approved

Other document** _____

Date Approved

Other document** _____

Date Approved

Other document** _____

Date Approved

*List applicable LUPs (e.g., Resource Management Plans or applicable amendments).

**List applicable activity, project, management, water quality restoration, or program plans.

☐ The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

☒ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

The Safford District will endeavor to provide a variety of recreational opportunities that meets public demand and are compatible with the Bureau's stewardship responsibilities.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

Special Recreation Permits for Commercial Recreation Activities on Public Lands in Arizona EA Number AZ-931-93-001 and EA Number AZ-040-08-14.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Documentation of answer and explanation: Yes

The proposed actions are provided for in the Safford RMP. Additionally the existing special recreation permit EA for commercial recreation activities on public lands in Arizona analyzes day use and multiple day trips for commercial recreation operators who propose activities that comply with the standard stipulations shown in Attachment A of the EA. Much of the EA analyzes overnight camping, multiple day activities, vehicle use, use of pack stock, use of campfires, and use of latrines.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, resource values, and circumstances?

Documentation of answer and explanation: Yes

The trips [Todd's Guide Service](#) proposes are included in the types of activities analyzed in the 1993 SRP EA. As proposed, their planned activities would have less impact on the public lands than the overnight activities discussed in the existing EA, since no overnight camping would occur on public land. The types of activities proposed are covered by the analysis of the existing EA.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably

conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Documentation of answer and explanation: Yes

The existing EA analyzes two alternatives, the Proposed Action Alternative (issues a commercial permit with stipulations) and the No Action Alternative (no permitting). That range of alternatives adequately covers [Todd's Guide Service's](#) proposed guided hunts. There has been no significant change in the circumstances or significant new information germane to the Proposed Action. Additional wildlife species have been listed under the Endangered Species Act since preparation of the existing EA, but state and federal wildlife management agencies have not prohibited or restricted hunting, trail riding, or wildlife viewing and photography on BLM administered public lands in their efforts to manage these species. In the year 2000, the BLM Safford Field Office completed a Sec. 7 consultation on special recreation use permits for riparian areas for commercial and private outfitters who use horses and/or mules. The results of that consultation are included in the permit stipulations. The proposed activities would not significantly impact T&E wildlife species when carried out under the permit stipulations.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation: Yes

The methodology/analytical approach previously used is appropriate for the Proposed Action. Since the existing EA covers a broad range of commercial recreation activities over a large area (public lands in the entire State of Arizona), the analysis is somewhat general in nature. The proposed commercial activities, however, are simple, and really no different than the same activities carried out by thousands of private hunters, hikers, and horseback riders using public lands annually. The analysis in the existing EA is appropriate to cover the effects of the proposed operations.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation: Yes

The direct and indirect impacts of the proposed guiding business are not significantly different than those identified in the existing SRP EA. The impacts of these activities would be less than many of the overnight activities analyzed in the existing EA. Further, additional beneficial economic impacts would result from the issuance of a permit for the proposed guiding activity.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation: Yes

The proposed hunting guiding business would not change the analysis of cumulative impacts in the existing EA because it is included in the types of commercial activities analyzed in that EA. Further, the existing environment has not changed substantially since 1993, necessitating further analysis of impacts from commercial recreation uses.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequately for the current proposed action?

Documentation of answer and explanation: Yes

Public involvement in the existing SRP was substantial. About 700 draft EAs were mailed for review and comment during preparation of the analysis. Many individuals, organizations, and agencies were asked to review the draft EA.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Resource Represented</u>
Deborah Morris	Recreation
Anna Rago	Cultural Resources
Tim Goodman	Wildlife, T&E Animal Species
Phil Cooley	Range
Delbert Molitor	Soil, Water, Air
Ted McRae	T&E Plant Species, Riparian
Michelle Cox	Nonnative/Invasive Plants
Scott Evans	Lands/Realty
Tom Schnell	Wilderness/ACECs
Heidi Blasius	Fisheries
Larry Thrasher	Hazardous Materials
Marlo Draper	Environmental Justice/NEPA

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked

Signature of the Responsible Official